UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

SEP 1 1 2018

Mr. Mark Withrow, P.E.
Environmental Management Division
City of Los Angeles Harbor Department
425 S. Palos Verdes Street
San Pedro, CA 90731

Re: USEPA's Conditional Approval for Port of Los Angeles, Wilmington Marines Services, Wilmington, California
USEPA ID: PCBCA2018001

Dear Mr. Withrow:

Thank you for submitting the summary of proposed supplemental characterization sampling activities for polychlorinated biphenyls (PCBs) in soil at the Wilmington Marines Services property. The initial correspondence proposing supplemental activities under the Toxic Substances Control Act (TSCA) pursuant to 40 C.F.R. § 761.61(c), was sent to Mr. George Randall of the U.S. Environmental Protection Agency (USEPA) via electronic mail on July 23, 2018 (Application). The Application was prepared for the property located west of South La Paloma Avenue and South Fries Avenue in Wilmington, California (Site). The Site operated as a former boat yard and has been impacted by PCBs from previous servicing/maintenance activities (e.g., boat sandblasting on the property). USEPA understands that the Site is scoped for redevelopment, and will be converted into an extension of the maintenance yard owned and operated by the Port of Los Angeles (Port of LA).

In summary, the Application proposed the following:

- Collection of 21 asphalt core samples for PCB analysis.
- Advancement of 25 step-out borings for analysis of PCBs and 7 additional contingency borings in the case that PCBs are detected above 1 part per million (ppm).
- Advancement of one hydropunch boring near WMS103, where total PCBs were detected at 75 ppm, and collection of filtered and unfiltered samples for PCB analysis.
- Request to establish an action level of 1 ppm for total PCBs for on-site soils. This is based on the PCB (Aroclor 1260) regional screening level (RSL) for industrial soil.
- Collection of in-situ characterization sampling in order to limit confirmation sampling during remediation, if the Port of LA extends the remedial excavation to boring locations where PCBs are not detected at concentrations above the action level.
- Request for any special requirements that the USEPA may have regarding the Port of LA Construction Division's plan to install a water line along the eastern portion of the site.

The USEPA has reviewed the Application submitted in accordance with 40 C.F.R. § 761.61(c), and is approving this request with conditions. However, the Port of LA shall coordinate all other regulated activities not subject to TSCA with the appropriate State or other local implementing agencies, as required by other applicable regulations.

The USEPA understands that PCBs are also present in the sediments in the adjacent waterway, which is part of the western boundary of the property. The Port of LA personnel and USEPA personnel discussed PCB-contaminated sediments at the Port of LA during a conference call on August 16, 2018. It is USEPA's understanding that sediments at the Site, as well as throughout the Port of LA, will be addressed at a later date, in accordance with the Contaminated Sediments Management Plan that is currently in review with the Los Angeles Regional Water Quality Control Board, as well as other local implementing agencies. It is also USEPA's understanding that public access to the waterway is restricted and fishing is not allowed. The Port of LA shall keep USEPA informed of progress on finalizing the Contaminated Sediments Management Plan, as USEPA will need to be involved in oversight of PCBs in sediments at the Site when appropriate.

The Port of LA is subject to the following conditions pursuant to 40 C.F.R. § 761.61(c), and shall incorporate these conditions while conducting TSCA activities at the Site.

USEPA Conditions on the PCB Report:

1. **PCB Action Levels for On-Site Soils.** The Port of LA has suggested a cleanup goal of 1 ppm for total PCBs in soil, which associated with is the RSL for industrial soil for Aroclor 1260 (0.99 ppm). This action level is acceptable for the Site's proposed use, as well as for worker protection. However, the Port of LA shall also implement best management practices (BMPs) at the Site to help ensure that residual PCBs in soils that may remain following remediation activities at the Site do not impact the adjacent waterway. USEPA is open to discussing possible BMPs with the Port of LA that may be implemented to help mitigate potential residual PCB migration.

2. **PCB Migration Evaluation.** Currently, the ground surface at the Site appears to be relatively even, and composed of hard surfaces (e.g., pavement) and soil. The Port of LA shall provide USEPA with information on the surface drainage infrastructures and outfall locations into receiving waters. Once the drainage and discharge locations at the Site are identified, the Port of LA shall collect samples of the particulates that accumulate at the drains or outlets to evaluate the migration patterns of PCBs. This may be done using various methods proposed by the Port of LA (e.g., use of a reverse witch's hat at drainage locations) depending on Site specific conditions. This data may be used to evaluate the contaminant pathways of potential PCB source area(s), and will help determine whether or not further PCB mitigation at the Site is warranted.

3. **Non-TSCA Contamination.** The USEPA only regulates PCB contamination at the Site. Based on the data submitted, it is apparent that on-site soil contains other non-PCB contaminants of concern (COCs), such as petroleum hydrocarbons and metals. The Port of LA shall work with other State and/or local implementing agencies to address other contamination that may be present in soil/sediment at the Site. Since the oversight of the cleanup or management of these COCs are not under USEPA's TSCA jurisdiction, these COCs will need to be addressed by another appropriate environmental overseeing agency.

4. **PCB Extraction.** USEPA prefers that PCBs in soil be analyzed using the USEPA Method 8082 with Soxhlet extraction (USEPA Method 3540C). The Port of LA will need to specifically request that the analytical laboratory use Soxhlet extraction, as it is not generally used as the default extraction method by laboratories.

5. **PCB Contaminated Soil Removal.** The Port of LA requested approval for collection of additional in-situ characterization samples in order to limit the confirmation sampling warranted during removal efforts. Additional characterization may be conducted by the Port of LA in order to limit the extent of soil removal. However, USEPA recommends that the Port of LA keep us informed of these activities in order to ensure that any supplemental characterization, removal, and disposal activities are taking place in accordance with TSCA.

6. **New Utility Construction.** The USEPA understands that a water pipeline will be constructed a depth of approximately 5 feet bgs across the eastern portion of the property as part of the redevelopment effort at the Site. USEPA recommends that any stained or visibly contaminated soil encountered be removed during the trenching effort. Furthermore, a Soil Management Plan (SMP) should be prepared, if one does not already exist, to address environmental issues associated with proposed utility construction activities, including, but not limited to: dust control, storm water run-on and run-off controls, and air monitoring.

7. **Schedule.** The Port of LA shall incorporate the conditions of this approval amendment during field activities, and shall notify the USEPA of exact dates of TSCA activities prior to commencing work at the Site.

For future application submittals, certification language provided in 40 C.F.R. § 761.61(a)(3)(i)(E), as well as language under "Certification" in 40 C.F.R. § 761.3, is required. This certification shall be signed by both the property owner as well as the cleanup party. USEPA will work with the Port of LA on any other regulatory requirements that would have to be included in future submittals.

Lastly, USEPA's Principles for Greener Cleanups and Greener Cleanups Policy encourage the evaluation and implementation of Greener Cleanup activities for all cleanup programs. Greener Cleanups is the practice of incorporating activities that reduce the environmental footprint of the cleanup while still attaining cleanup goals. Please consider applying the BMP Checklist from the ASTM Standard Guide for Greener Cleanups at the Site.

This document does not relieve the Parties and their consultants from complying with other applicable TSCA PCB and Federal regulations, or state and local regulations and permits. Nothing in this document bars USEPA from imposing penalties for violations of this comment letter or for violations of other applicable TSCA PCB requirements or for activities not covered under this letter. USEPA reserves the right to require additional characterization and/or cleanup of PCBs at the Site if new information shows that PCBs remain at the Site above the USEPA-approved PCB action levels, or if PCBs are found at other areas of the Site or immediately adjacent to the Site. In addition, USEPA may require cleanup of areas immediately adjacent to the Site if those areas are found to be impacted by PCBs from the Site.

We look forward to working with you further on this project. If you have any questions concerning this document, please contact Cynthia Ruelas of my staff at (415) 972-3329. Thank you for your cooperation.

Sincerely,

Jeff Scott, Director
Land Division